MAY 16 1990

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas Shingleton
Ekco Housewares
685 Third Avenue
New York, New York 10017

Re: Notification of Disapproval of the Quality Assurance Plan and Laboratory Evaluation for EKCO Housewares, Inc.
OHD 045 205 424

Dear Mr. Shingleton:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the above-referenced plans for the EKCO Housewares facility in Massillon, Ohio. These plans are hereby disapproved. The deficiencies and comments on the plans are enclosed.

As stated in the Administrative Order on Consent, EKCO Housewares may meet with U.S. EPA to discuss problems with the workplan within thirty (30) days of receipt of this letter. Within thirty (30) days of this meeting or receipt of this letter (whichever is later) you must submit a revised workplan which addressed the enclosed deficiencies/comments. If you should have any questions or wish to request a meeting, please contact Sally Averill at (312) 886-4439.

Sincerely yours,

William E. Muno, Chief
RCRA Enforcement Branch

Enclosure

5HR-12:SAVERILL:sbowie:6-4439:sally #2 disk:5/1/90:ekcots.ltr

ap 5/16/90

	TYP.	AUTH.	IL/IN TECH. ENF. SEC.	MI/WI TECH. ENF. SEC.	OH/MN TECH. ENF. SEC.	IL/MI/WI ENF. PROG. SECTION	IN/MN/OH ENF. PROG. SECTION	RCRA ENF. BR. CHIEF	O. R. A.D.D.	WMD DIR
INIT. DATE	SVS 5/9	SA 5/14			5.16.90			SCS 5-16-90		

for WEM

COMMENTS

Page 1.1

A signature space for the Region V Quality Assurance (QA) Officer should be provided.

Page 3.9

Contaminants of concern are listed in Table 3.1. Please note that the three (3) dichlorobenzene isomers are not included in the methods listed in Tables 5.1, 9.1, 9.2, and 9.2A.

Page 5.2

Table 5.1 does not define how accuracy is defined, e.g., Matrix spikes, lab controls, etc., also, the test procedures for the metals in Table 5.1 may not be the test procedures used for the CLP scope of work of Table 9.3. For example the detection limits for Cd, Pb, etc., of Table 9.3. may not correspond to the detection limits of method 6010 in Table 5.1.

Page 5.2

Table 5.1 does not provide Quality Control (QC) audits for Method 524 of Table 9.2.

Page 6.18

The holding time for volatiles is too long for non-acidified samples.

Page 6.18

Samples for wells should be tested as unfiltered, with dissolved as an additional option. Suspended solids should also be collected to help interpretation of the metals data.

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Table 9.1 needs to include the measurement of cis-1,2,-dichloroethylene. Please assure that Method 524 of Table 9.2 also includes cis-1,2-dichloroethylene. Table 3.1 should also include cis-and trans-1,2-dichloroethylene.

Page 9.4

When using Method 524 (524.1 or 524.2) please provide assurance that the required detection limits will not be overly influenced by sample detection in order to compensate for any high level volatile organic contaminants (VOC) or interferences.

General Comments

The QAPP must specify the test procedures which will actually be used.

What detection limits will actually be used for Method 8240 and the CLP scope of work methods.

Please provide the sample preparation/digestion procedures which will be used for metals and volatiles for both soils and water.

In Section 9.1 common laboratory contaminants are discussed. Blanks must contain no significant levels of acetone, etc., as listed in Table 3. Use of less than five (5) times the contract required detection limit is not acceptable.

Use of two (2) levels of data documentation is not acceptable. All data should be treated as evidential.

The data review identified is not equivalent to CLP guidelines. Please provide a description of how the data will be reviewed.

Matrix spike/matrix spike duplicates must be done for each matrix type and sample type tested.

Analytical spikes of graphite furnace are not included. Matrix spikes cannot be replaced by reagent water spikes.

Test procedures and sample preparation detection limits must be specified. Specifications for data package or evidence records are unacceptable for an enforcement project.

Please identify which of the Weston laboratories will actually be performing the work. The QAPP should be tailored to the specific laboratory.

5HR-12:SAVERILL:sbowie:6-4439:sally #2 disk:5/1/90:ekcots.ltr

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5/16/90

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INIT. DATE	5/9	5/14			5.15.90			5/16/90 for SKS		

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Test procedures and sample preparation detection limits must be specified. Specifications for data package or evidence records are unacceptable for an enforcement project.

Please identify which of the Weston laboratories will actually be performing the work. The QAPP should be tailored to the specific laboratory.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5QAS

MEMORANDUM

DATE: MAY 07 1990

SUBJECT: Quality Assurance Review and Laboratory Evaluation for EKCO Housewares, Incorporated

FROM: James H. Adams Jr., Chief
Quality Assurance Section

TO: Sally Averill,
RCRA Enforcement

The combined response from the Quality Assurance Section and the Central Regional Laboratory is as follows:

1. page 1.1 - A signature space for the Region V QA officer should be provided.

2. page 3.9 - Contaminants of concern are listed in table 3.1. Please note that the three dichlorobenzene isomers are not included in the methods listed in tables 5.1,9.1,9.2, and 9.2A.

3. page 5.2 - Table 5.1 does not define how accuracy is defined, eg, matrix spikes, lab controls, etc. Also the test procedures for the metals in table 5.1 may not be the test procedures used for the CLP SOW of table 9.3. For example the detection limits for cd, pb, etc. of table 9.3 may not correspond to the detection limits of method 6010 in table 5.1.

4. page 5.2 - Table 5.1 does not provide QC audits for method 524 of table 9.2.

5. page 6.18 - The holding time for volatiles is too long for non-acidified samples.

6. page 6.18 - Samples for metals from wells should be tested as unfiltered, with dissolved as an additonal option. Suspended solids should also be collected to help interpretation of the metals data.

7. page 9.2 - Table 9.1 needs to include the measurement of cis-1,2-DCE. Please assure that method 524 of table 9.2 also includes cis-1,2-DCE. Table 3.1 should include cis-and trans-1,2-DCE.

8. page 9.4 - When using method 524 (524.1 or 524.2) please provide assurance that the required detection limits will not be overly influenced by sample dilution in order to compensate for any high level voc or interferences.

9. The QAPP must specify the test procedures which will be actually used.

10. What detection limits will actually be used for method 8240 and CLP SOW methods?

11. Please provide the sample preparation/digestion procedures which will be used for metals and volatiles for both soils and water.

12. In Section 9.1 common laboratory contaminants are discussed. Blanks must contain no significant acetone, etc. of table 3. Use of <5xCRDL is not acceptable.

13. Use of two levels of data documentation is not acceptable. All data should be treated as evidential.

14. The data review identified is not equivalent to CLP guidelines. Please provide a description of how the data will be reviewed.

15. Matrix spike/matrix spike duplicates must be done for each matrix type and sample type tested.

16. Analytical spikes of GFAA are not included. Matrix spikes cannot be replaced by reagent water spikes.

17. Test procedures, sample preparation, and detection limits must be specified. The specifications for data package or evidence records are unacceptable for an enforcement project.

18. Please identify which of the Weston laboratories will actually be performing the work. The QAPP should be tailored to the specific laboratory.

If there are questions please call Maxine Long at 353-3114.

cc: D. Payne

Date: April 25, 1990

Subject: Quality Assurance Review and Laboratory Evaluation for EKCO Housewares, Inc.

From: James H. Adams
Chief, Quality Assurance Section

TO: Sally Averill, RCRA Enforcement

Combined Response from the Quality Assurance Section and the Central Regional Laboratory follows:

1. Page 1.1 - A signature space for the Region V QA Officer should be provided.

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8. Page 9.4 when using method 524 (524.1 or 524.2) please provide assurance that the required detection limits will not be overly influenced by sample dilution in order to compensate for any high level VOC or interferences.

9. The QAPP must specify the test procedures which will be actually used.

10- What detection limits will actually be used for method 8240 and CLP SOW methods?

11- Please provide the sample preparation/digestion procedures which will be used for metals and volatiles for both soils and water.

12- In Section 9.1 common laboratory contaminants are discussed. Blanks must contain no significant acetone, etc. of table 3. Use of < 5 x CRDL is not acceptable.

13. use of two levels of data documentation is not acceptable. All data should be treated as ~~as~~ evidential.

14. The data review identified is not equivalent to CLP guidelines. Please provide a description of how the data will be reviewed.

15. Matrix spike / matrix spike duplicates must be done for each matrix type and sample type tested.

16. analytical spikes of DFTPP are not included. Matrix spikes cannot be replaced by reagent water spikes.

17. Test procedures, sample preparation, detection limits must be specified. Specifications for data package or evidence records are unacceptable for an enforcement project.

18. Please identify which of the Region laboratories will actually be performing the work. The QAPP should be tailored to the specific laboratory.

If there are questions please call Marjorie Long at 3-3114.

C.C. Dave Payne.

P. 1 of 6

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: 4-22-90

SUBJECT: QA Project Plan (QAPP) EKCO Housewares, Inc., Massilon, OH

FROM: David A Payne, Chemist

TO: LSSS, CRL

Maxine Long
QA Section

We have reviewed the subject QAPP and find it not acceptable.

1. In Table 3-1, contaminants of concern are listed. Note that the 3 dichlorobenzene isomers will not be tested by the methods listed in table 9-2, 9-2A, 5-1, and 9-1. It appears that Weston will be testing for CLP SOW TCL* volatiles by 2 ~~two~~ variations of the same test procedure, but has made no provisions for dichlorobenzenes.

2. We find metals are not done on all well waters, only the wells on the property boundry. Also, the well waters are dissolved. To protect the municipal supplies, metals should be tested as unfiltered metals, with diss as an additional option. Susp. solids should also be collected to help interpretation of the metals data.

Table 6-1.

3. Soils will be tested for VOCs only. — no metals.

4. It seems that this study or project will only look for contaminants they have tested for in the past. Why not Appendix IX? This should be discussed with EPA Project Manager.

5. Table 5-1 does not define how accuracy is defined - matrix spikes, lab controls, etc. Also test procedures for the metals in Table 5-1 may not be the test procedures used for the CLP SOW of Table 9-3 For example, the d.l. for Cd, Pb, & Tl of Table 9-3 may not correspond to the d.l's of Method 6010 in Table 5-1

6. Table 5-1 does not provide for QC audits for Method 524 of Table 9-2.

7. The holding time for volatiles is too long for non-acidified samples.

8. Table 9-1 needs to include the measurement of cis-1,2-DCE. We need to assure that Method 524 of Table 9-2 also includes cis 1,2-DCE. The Table 3-1 should include cis and trans 1,2-DCE

9. When using Method 524 (524.1 or 524.2) there has to be some assurance that required d.l.'s will not be overly increased by sample dilution in order to compensate for any high level VOC or interference.

10. The QAPP needs to spefify the test procedures actually to use

CLP SOW for 8240
What version of 524 — 524.1 or 524.2?
The test procedures to be used for Table 9-3 metals.
These are not Only CRDL's of CLP are provided for metals. No test procedure descriptions or references are provided.
What d.l.'s will actually be used for the Method 8240 and CLP SOW metals.

- What prepdn preparation/digestion procedures are used for metals and volatiles, both for soils and for waters.

11. In Section 9.1 — common lab contaminants are discussed. Blanks must contain no significant $MeCl_2$, acetone, etc. of Table 3-1
The use of < 5XCRDL is not acceptable if usable data are to be obtained.

12. Weston plans to use 2 levels of data documentation - Level I ~~and~~ or Level III, See Section 9.1.2

This is unacceptable, Level I will provide no evidential records.

Evidential Records, under chain-of custody, will be necessary for all samples. ~~All~~

The QA Plan specifications are unacceptable for evidential records and Data Review Validation

Weston is providing ~~no~~ no data review ~~similar~~ equivalent to the CLP guidelines, Data review is unacceptable for Section 10.2.4

13. The CLP oversight ~~in S by~~ for QA in Section 11.1 is not applicable to Weston-Gulf Coast, maybe for Weston-PA, and even this is ~~not~~ occurring at the moment.

14. Short cuts are being taken for QC audits. The CLP SOW volatiles may not use matrix spikes, but changed to MS/MSD's of reagent water. These ~~are~~ may be important for soils — but not for waters with their surrogate. MS/MSD's need also to be done for each matrix type and sample type tested.

15. The metals QC of Section 14.2 does not include analytical spikes of GFAA to calculate results. ~~IR~~ Section 14.2.1 matrix spikes are being replaced by spikes of reagent water.

16. No where is the lab, doing the work, mentioned. We believe it is Weston Gulf Coast. John Boudreau is Lab Director.

7. The QAPP is unacceptable

No real specific test procedures are mentioned, including sample prep. How does Method 524 vary from Method 8240? What actual D.L.'s are to be used? CRDLs do not count.

The specifications for data packages or evidentiary records, internal QC, and data review are unacceptable for an enforcement project.

EKKO

Maxine -

Before I comment on this QAPP, I need to contact Weston to see if Gulf Coast or Weston PA lab is going to do the work. This has a bearing on lab capability & test procedures. My review is complete but not written-up. The write-up will depend on lab to be used. Please note the QAPP is written for June 1989. A lot of IC problems have occurred since then and Weston has been passed for CLP Inorganics for non-performance.

Dave.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: FEB 15 1990

SUBJECT: Quality Assurance Review and Laboratory Evaluation for EKCO Housewares, Inc.

FROM: William E. Muno, Chief
RCRA Enforcement Branch

ORIGINAL SIGNED BY
WILLIAM E. MUNO

TO: Addressees

Attached for your review is the EKCO Housewares, Inc., Quality Assurance Laboratory Evaluation. EKCO is under a Consent Order to perform a RCRA facility investigation and is subject to the United States Environmental Protection Agency (U.S. EPA) quality assurance requirements.

Please review the attached document and provide comments by February 28, 1990, on whether the EKCO QA/QC program is appropriate.

Please contact Sally Averill at 886-4439 to discuss the best approach to ensure a proper QA/QC program for the EKCO Study.

Attachment

Addressees:

Curtis Ross, Director
ESD, Central Regional Lab (5SCRL)

Valerie Jones, Chief
ESD, Monitoring and Quality Assurance Branch (5SMQA)

5HR-12SAVERILL:sbowie:6-4439:disk #2:2/8/90:ekco.qar

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INIT. DATE	SHB 2/13							WEM 2/14/90		

SUMMARY OF CLEANUP CRITERIA CURRENTLY USED BY REGION VII STATES

TARGET COMPOUNDS: BENZENE, TOLUENE, XYLENE, TOTAL HYDROCARBONS
TARGET MEDIA: SURFACE WATER, GROUND WATER, AIR, SOILS

	Benzene (ppb)	Toluene (ppb)	Xylene (ppb)	Total Hydrocarbons (ppm)
IOWA				
surface water[1]	5/70	2000/-	440/-	--
ground water[2]	5/70	2000/-	440/-	--
air[3]	1 ppm	200 ppm	100 ppm	--
soil	--	--	--	100
KANSAS				
surface water[1]	5/-	2000/-	440/-	--
ground water[2]	5/-	2000/-	440/-	--
air[3]	1 ppm	200 ppm	100 ppm	--
soil	--	--	--	<100[4]
MISSOURI				
surface water[1]	0.66/-	14.3/-	440/-	--
ground water[2]	0.66/0.66	14.3/14.3	440/440	--
air[3]	1 ppm	200 ppm	100 ppm	--
soil	--	--	--	100[5]
NEBRASKA				
surface water[1]	0.66/-	14.3/-	--	--
ground water[2]	0.66/-	14.3/-	--	--
air[3]	1 ppm	200 ppm	100 ppm	--
soil	--	--	--	case-by-case[6]

[1]Ambient water criteria: drinking water supply source (or potential)/not a drinking water supply source
[2]Drinking water supply source (or potential)/not a drinking water supply source
[3]Indoor/outdoor ambient air standard, OSHA, 8 hr. time-weighted-average
[4]Kansas' procedure is to initially cleanup soils to the point where there is no visible contamination or strong odor, then test the soil using a sealed quart jar half-filled with soil, warmed to 70-72F for 5 minutes, then Draeger-tube tested for petroleum hydrocarbons; soil is considered clean when test shows level below 100 ppm.
[5]Missouri reports a case-by-case criteria, but it has been observed that 100 ppm is considered to be reasonable.
[6]Nebraska's criteria for soil cleanup is based solely on the potential of the soil as a contaminant reservoir for underlying groundwater; cleanup levels are determined for soils based on the results of modeling their potential impact on the groundwater.

AMERICAN HOME PRODUCTS CORPORATION

685 THIRD AVENUE
NEW YORK, N.Y. 10017
(212) 878-5000

December 11, 1989

Ms. Sally Averill
U.S. Environmental Protection Agency
Region V
230 South Dearborn St., 5HR-12
Chicago, IL 60604

Dear Ms. Averill:

I am writing in follow-up to your telephone conversation of December 6, 1989 with Randy McAlister of Roy F. Weston Inc. regarding the comments on the Groundwater Quality Assessment Report/Workplan for the Ekco Housewares Inc. site in Massillon, Ohio. This will confirm that USEPA views the conversation as the receipt of final comments on the document, and that the final revised document is due to USEPA on January 5, 1990. The revised document, incorporating all changes agreed at our meeting of November 27, 1989 and in the December 6 phone call, will be forwarded to you on or before January 5, 1990.

Should you have any questions, please feel free to contact me.

Very truly yours,

Timothy McGuinness

Timothy McGuinness
Manager, Environmental
Engineering

TM:mms
CC: G. Moss
S. Oster
T. Shingleton, Ekco
H. Byer, Weston

WESTON
MANAGERS DESIGNERS/CONSULTANTS
WESTON WAY
WEST CHESTER, PA 19380
PHONE: 215-692-3030
TELEX: 83-5348

10 November 1988

Mr. Walter Nied
U. S. EPA REGION V
230 S. Dearborn St.
Chicago, IL 69604

W.O. #2994-02-03

Dear Mr. Nied;

Please find enclosed three copies of the revised Quality Assurance Management Plan (QAMP) for the implementation of the Groundwater Quality (GWQA) per you comments dated October 18, 1988.

All your requested changes have been incorporated with the exception of comments 5 and 10. We have not incorporated comment #5 for two reasons:

1. The production wells would most likely have to be shut down and dismantled to be sampled in the manner that your comment infers.

2. The objective of the sampling and analysis of the production wells is not to define the perimeter of the contaminated plume, since, the production wells are being used in the groundwater reclamation project.

Comment 10 was not addressed directly in this version of the QAMP because I-3 was not designed as an observation well in the September 1988 version of the QAMP. The observation wells well be clearly designated in the Pump Test Technical Memorandum to be submitted in the near future.

If you have any questions and/or comments, please do not hesitate to contact me at (215) 344-3643.

Very truly yours,

ROY F. WESTON, INC.

Harold G. Byer, Jr.
Project Manager

HGB/mq
Attachments
cc: T. McGuinness
M. Eggert, OEPA

OCT 18 1988

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Timothy McGuiness, Manager
Environmental Engineering
American Home Products, Incorporated
685 Third Avenue
New York, New York 10017

Re: Quality Assurance Management Plan
Ekco Housewares, Inc.
OHD 045 205 424

Dear Mr. McGuiness:

My staff has reviewed Ekco Housewares, Inc.'s revised Quality Assurance Management Plan (QAMP) which was received by the United States Environmental Protection Agency (U.S. EPA) on June 2, 1988. This plan is approved by the U.S. EPA with the following modifications:

1. Include Well W-2 in Table 44 as a well to be sampled to assist in the assessment of contaminant migration.

2. Commit on Page 2-8 to preparing separate potentiometric maps of the bedrock and unconsolidated deposits.

3. On Page 2-4 commit to properly disposing of potentially contaminated well/soil cuttings.

4. On Page 2-8 commit to conducting a one event assessment to determine if any dense phase immiscibles are present in any of Ekco's monitoring wells. Change 3.h. on Page 2-8 to confirm that if immiscibles are present the groundwater will be sampled and a remediation plan submitted.

5. Revise Section 2.2.2. on Page 12 to commit to not exceeding a pumping rate of 100 ml/min. Not for Prod. Well

6. Revise Section 2.6 Item 3 and state, "the samples for metals analyses will be collected in clean, unused containers, will be field filtered, and poured into the appropriate containers to which preservative will subsequently be added."

7. Revise Section 3.2.3 to clarify if additional analytes will be investigated during this project. If no analyses for additional analytes are planned delete the last sentence of paragraph one.

8. At our meeting in Columbus, your consultant clearly committed to analyze all samples for the Target Compound List (TCL) volatile organic compounds. EPA Method 524 is not typically used for eight of the 35 TCL volatiles but can be modified to include measurement of these additional compounds. Revise the following sections of the QAMP to clarify your commitment to analyze all samples for the TCL volatile organic compounds: 1) on Page 4-1, Paragraph 2 change sentences 1 and 2 to "All samples will be analyzed for the TCL volatile organic compounds (Table 4-1) and the TCL metals and cyanide (Table 4-3). Samples will be analyzed by the methods specified in Table 4-4 in order to achieve the detection limits listed in Tables 4-1, 4-2 and 4-3." 2) On Page 4-1, Section 4.1, paragraph 2: Change sentence 1 to "Groundwater samples will be analyzed for TCL volatile organic compounds (Table 4-1) and inorganic constituents (Table 4-3)." 3) Also add a final sentence to Section 4-1, paragraph 2 which states, "EPA Method 524.2 will be modified in such a way that the following TCL organic compounds will be quantified by the method:

   A) acetone
   B) carbon disulfide
   C) trans-1,2-dichloroethene
   D) vinyl acetate
   E) 2-butanone
   F) 2-hexanone
   G) 4-methyl-2-pentanone
   H) 2-chloroethylvinylether

9. The analytical methods proposed in Section 4 are not appropriate for dichlorobenzene which is identified as a contaminant in Table 1-1. Revise the QAMP to commit to defining the extent of the dichlorobenzene contamination.

10. In Section 2-3, paragraph 1, substitute Well I-5 during the aquifer pumping test for Well I-3 which was reported as a dry hole and not completed. Also, commit to periodically measuring the static water level in all of the shallow wells in the plant area during the test.

Upon receipt of this approval with modifications, begin all activities committed to within your Groundwater Quality Assessment schedule on Page 1-16 of your QAMP. Please note that your schedule specifically commits your firm to begin the soil gas survey within 3 weeks of the receipt of this approval letter and that the Pump Test Technical Memorandum is past due. All sections of the QAMP affected by the ten (10) modifications, detailed above, are required to be revised and submitted to U.S. EPA within fifteen (15) days of the receipt of this letter.

Please contact Walter Nied of my staff at (312) 886-4466, if you have any questions regarding this letter.

Sincerely yours,

William E. Muno, Chief
RCRA Enforcement Branch

cc: Michael Savage, OEPA-CO
Michael Eggert, OEPA-CO
Susan McCauslin, OEPA-NEDO

bcc: Bob Swales
Susan Prout

5HR:12:WNIED:6-4466:10/6/88

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INIT. DATE	10/12/88	W.F.N. 10-12-88			10-13-88			JMB 10/18/88		

10/18/88

JE JACOBS ENGINEERING GROUP INC.
ENVIRONMENTAL SYSTEMS DIVISION
222 S. RIVERSIDE PLAZA - SUITE 1870 CHICAGO, ILLINOIS 60606 (312) 648-0002 FAX (312) 648-0551

October 17, 1988

Mr. Walter Neid
TES IV Primary Contact
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, IL 60604

Re: Contract No. 68-01-7351
Project No. 05-B483-00
Work Assignment No. 483
Ekco Housewares
Massilon, Ohio
Expert Witness/Consultant
RCRA, Region V

Dear Mr. Neid:

Please find submitted herewith two (2) copies of Metcalf and Eddy's review comments on the Final QAPP for Ekco Housewares, Massilon, Ohio.

If you have any questions or require additional information, please feel free to contact me at (312)648-0002.

Sincerely,

Dean Geers
Regional Manager

Enclosure

cc: F. Norling

U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL ENFORCEMENT SUPPORT
AT
HAZARDOUS WASTE SITES

TES IV
CONTRACT NO. 68-01-7351
WORK ASSIGNMENT NO. 483

REVIEW COMMENTS ON FINAL QAPP FOR EKCO HOUSEWARES MASSILON, OHI0

EXPERT WITNESS/CONSULTANT
EPA REGION V

JACOBS ENGINEERING GROUP INC.
PROJECT NUMBER: 05-B483-00

PREPARED BY:
METCALF AND EDDY, INC.

OCTOBER 1988

Metcalf & Eddy

6480 BUSCH BOULEVARD
SUITE 200
COLUMBUS, OHIO 43229
TELEPHONE (614) 436-5550

October 4, 1988

Mr. Walter Neid
RCRA Enforcement Section
U.S. EPA Region V
230 S. Dearborn
Chicago, IL 60604

Subject: Work Assignment 481
Review Comments on
Final Quality Assurance Management Plan for
Ekco Housewares dated September, 1988

Dear Mr. Neid:

The revised Quality Assurance Management Plan (QAMP) for Ekco Housewares received last Thursday has been reviewed. The final QAMP satisfactorily incorporated all of the 48 comments on the draft plan with the exception of those listed below.

Comment 6 . page 1-7
Sampling was requested of all the onsite and offsite wells. The final plan included sampling 7 wells omitted in the draft plan, but did not include well W-2. W-2 should be included in table 4-4 as a well to be sampled.

Comment 16. Page 2-8
The request to take water level measurements based on Mean Sea Level was incorporated. The second request to construct separate potentiometric maps separately of the wells in the sandstone and of those in the outwash sediments was not incorporated.

Comment 17
The method for detecting the dense phase immiscible layer, requested by OEPA, is not sufficiently addressed. There are various ways to determine if a dense phase layer exists, such as by changes in conductivity of the water in the well. A thieve-type sampler can be used to obtain a sample at the desired depth.

Comment 18
OEPA's comment was not incorporated. An honest effort should be made when sampling the production wells to keep the rate as low as possible to conform to the original comment on maintaining 100ml/min flow rate with minimum aeration.

Comment 23
The last sentence still implies that the container will be pre-preserved. It should be changed to read, " The samples for metals analyses will be collected in clean, unused containers, will be field-filtered, and poured into the appropriate containers to which preservative will subsequently be added."

Comment 26
No response was provided to this comment. If additional analytes will be determined during this project, they should be mentioned. If no analyses for additional analytes are planned, the last sentence of paragraph one of section 3.2.3 is unnecessary.

Comments 30-33,37
According to our discussions with representatives of Weston, their intent is to analyze all samples for the Target Compound List (TCL) volatile organic compounds, even though the analytical method for offsite or perimeter wells will be EPA Method 524 which is not typically used for 8 of the 35 TCL volatiles. This should pose no problem since the method can be readily modified to include measurement of these additional compounds. Nonetheless, the QAMP continues to state unclearly what was clearly stated in our discussions. To adhere to the intentions stated in discussions, the following changes to section 4 should be made.

Page 4-1, Paragraph 2: change sentences 1 and 2 to, "All samples will be analyzed for the Target Compound List (TCL) volatile organic compounds (Table 4-1) and the TCL metals and cyanide (Table 4-3). Samples will be analyzed by the methods specified in Table 4-4 in order to achieve the detection limits listed in Tables 4-1, 4-2, and 4-3".

Page 4-1, Section 4.1, paragraph 2: Replace sentence 1 with, "Groundwater samples will be analyzed for TCL volatile organic compounds (Table 4-1) and inorganic constituents (Table 4-3).

Add a final sentence to the paragraph reading, "EPA Method 524.2 will be modified in such a way that the following TCL organic compounds will also be quantified by the method, even though it does not usually include their quantification:

1) acetone
2) carbon disulfide
3) trans-1,2-dichloroethene
4) vinyl acetate
5) 2-butanone
6) 2-hexanone
7) 4-methyl-2-pentanone
8) 2-chloroethylvinylether."

Comment 36
The requested change is no longer necessary since the revised paragraph 2 of section 4 states the intention to use whichever EPA 6000/7000 Series Method will achieve the detection limits presented in Table 4-3.

Because changes were made to the draft QAMP to incorporate the EPA comments and new material is presented in the final QAMP, several addtional comments are warranted. These additional comments on new material are discussed below.

The revised QAMP, in response to review comment 3, has provided a list of contaminants found during a 1987 Weston investigation (page 1-3, last paragraph and page 1-5, Table 1-1). All but one of these parameters will be analyzed by the analytical methods proposed in section 4. The exception is dichlorobenzene. Some or all of the samples should be analyzed for dichlorobenzenes to define the extent of contamination by these compounds.

Well I-3 was previously proposed as a monitoring point as part of the aquifer pumping test to assess whether the bedrock and unconsolidated sediments function as one or two hydrologic zones. Because I-3 was reported as a dry hole and hence not constructed, another interface well should be substituted for I-3 during the aquifer pumping test, preferably I-5 (Section 2-3, paragraph 1, page 2-12). In addition, it would be desirable to periodically measure all of the shallow wells in the plant area during the test.

In the process of drilling, well I-3 may have been sealed off a water bearing zone. If the well had been constructed, the well may have produced water.

If you have any questions or comments please call Todd Struttmann or me.

Sincerely,

/s/ Struttmann for

Gerald Myers
Associate

TJS/

cc: Dean Geers, Jacobs Engineering Group
Susan Petrick
Todd Struttmann
File

WESTON WAY
WEST CHESTER, PA 19380
PHONE: 215-692-3030
TELEX: 83-5348

19 September 1988

Mr. Walter F. Nied, Jr.
Hazardous Waste Enforcement Branch
U. S. EPA Region V
230 S. Dearborn St.
Chicago, IL 60604

W.O. #2994-02-03

RE: Submittal of Revised EKCO Quality Assurance Management Plan

Dear Mr. Nied:

Enclosed you will find a copy of the revised Quality Assurance Management Plan for the EKCO Housewares, Inc. facility in Massillon, Ohio. This plan is in response to the most recent set of comments WESTON received from U.S. EPA Region V.

If there are any questions please contact me at (215) 344-3643.

Very truly yours,

ROY F. WESTON, INC.

Harold G. Byer, Jr.
Project Manager

HGB/mq
Attachment
cc: Mr. T. Shingleton, EKCO
Mr. T. McGuinness, American Home Products
Ms. S. McCauslin, EPA, NE Office

5HR-12

SEP 0 2 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Timothy McGuiness, Manager
Environmental Engineering
American Home Products Corporation
685 Third Avenue
New York, New York 10017-4085

Re: Ekco Housewares, Inc.
OHD 045 205 424

Dear Mr. McGuiness:

Our Quality Assurance Section staff and the Ohio Environmental Protection Agency's (OEPA) staff have reviewed Ekco Housewares, Inc.'s Quality Assurance Project Plan (QAPP) which was received by the United States Environmental Protection Agency (U.S. EPA) on June 28, 1988. Attachment 1 details the revisions that will be necessary before your plan can be accepted by the U.S. EPA. The attached revisions shall be incorporated into Weston's Quality Assurance Project Plan for Ekco Housewares, Inc., Massillon, Ohio.

These revisions shall be incorporated into your plan and a Final Quality Assurance Project Plan submitted within fifteen (15) days of receipt of this correspondence. Please call Walter Nied of my staff at (312) 886-0992, if you have any questions concerning these revisions.

Sincerely yours,

Sally K. Swanson, Acting Chief
RCRA Enforcement Branch

Enclosure

cc: Michael Savage, OEPA-CO
Michael Eggert, OEPA-DGW-CO
Susan McCauslin, OEPA-NEDO

bcc: Maxine Long, ESD-QAS

5HR-12:WNIED:fharris:6-0992:8/4/88

8/8/88

	TYP.	AUTH.	IL/IN TECH. ENF. SEC.	MI/WI TECH. ENF. SEC.	OH/MN TECH. ENF. SEC.	IL/MI/WI ENF. PROG. SECTION	IN/MN/OH ENF. PROG. SECTION	RCRA ENF. BR. CHIEF	O.R. A.D.D.	[illegible] Dir.
IT. ATE	8/9/88	W.F.N. 8-9-88			W.F.N. EM J.B 8-9-88			SKS 8-16-88		

In lieu of yellow tissue

RCRA CONCURRENCE SHEET

SUBJECT: Timothy McGuiness- American Home Products

Ekco Quality Assurance Project Plan

****

CONCURRENCES ON DRAFT

	INITIALS	DATE
TYPIST/SECRETARY	[illegible]	8/9/88
PREPARER	W.F.N.	8-4-88 TYPOS/REVISIONS MARKED
CHIEF, OH/MN TES	[redacted] W.F.N. for J.B.	[redacted] 8-8-88
CHIEF, MI/WI TES		
CHIEF, IL/IN TES		
CHIEF, IL/MI/WI EPS		
CHIEF, IN/MN/OH EPS		
OTHERS		

****

APPROVAL

TYPIST/SECRETARY	[illegible]	8/9
PREPARER	W.F.N.	8-9-88
CHIEF, OH/MN TES	W.F.N.	8-9-88
CHIEF, MI/WI TES		
CHIEF, IL/IN TES		
CHIEF, IL/MI/WI EPS		
CHIEF, IN/MN/OH EPS		
REB SECRETARY	AP	8-10-88
CHIEF, REB	JB for SKS	8-16-88
CHIEF, SWB		
OFFICE OF RCRA A.D.D.		
WMD DIRECTOR		
OTHERS		

ATTACHMENT

EKCO HOUSEWARES, INC.'S DRAFT QUALITY ASSURANCE PROJECT PLAN COMMENTS (QAPP)

General

9-29-88

APPROVAL/ MODIFICATIONS NEEDED

This document does not accurately describe what needs to be done for the specified project. Furthermore, CLP specified quantitation and detection limits are not appropriate for this project since this is a RCRA site. Therefore, this Quality Assurance Project Plan (QAPP) should be revised to conform to RCRA methods where possible and to the NPDES or SDWA methods if appropriate.

Specific

1) Page 1-1

SEPT. REVISED COMMENT

The larger document should be called something other than a Quality Assurance Project Plan since it encompasses more than a QAPP (see sentence 1 of paragraph 2)

NOW Q.A.M.P. MANAGEMENT

2) Page 1-3 Note-Does not mention VOC's TO SE!

Paragraph 1, last sentence: List the specific waste materials that were produced (and discharged) in the manufacture of porcelain/teflon-coated cookware, This information is needed to determine whether or not the appropriate analyses have been planned.

3) Page 1-3 TABLE 1-1

Paragraphs 2 & 3: Include a table listing contaminants detected at the Ekco facility.

4) Page 1-3 DELETED

Delete statements (A). "glacial outwash deposits are predominantly clay" and (B.) "Valley Fill is greater than 250 feet thick."

5) Page 1-7 1-9

"Aquifer Testing": It should be stated that aquifer properties will be determined only for the sandstone aquifer. The test will also be useful in determining whether a close hydraulic connection exists between the sandstone aquifer and the overlying unconsolidated sediments.

*No Modification "O.K." → Mike Eggert

6) Page 1-18

NO JUSTIFICATION TO DELETE THESE WELLS

The groundwater sampling program shall include all on-site and off-site wells.

"All onsite except D-2-25, D-2-30 & D-3-17"

WELL #4 ALSO SAMPLED

↑ Replaced/New Wells

SUSAN PETRICK
MEL QA/CXPANT
TABLES 4.1, 4.2, 4.4-3.

MODIFICATIONS NEEDED

7) Page 1-7 "Specified in Sec. #4" method 524 for VOA's

(1) VINYL CHLORIDE MUST BE AT 1ppb D.L. chg to comment

Section 1.3.3, last sentence: The list of analytes is not well enough defined. Which volatile organic compounds (VOC's)? Priority pollutant? Target compound list? Appendix IX 40 CFR Part 264? Which heavy metals? The current analyses used in monthly monitoring shall be referenced. "AN. METHODS SPECIFIED IN SW846.

8) Page 1-7

(2) Need ANALYSES FOR → 1 ROUND MIN.

Section 1.3.5, third sentence: If fuel and gasoline contamination of soils may have occurred, analysis of samples for at least those semi-volatile organic compounds in fuels should be considered.

9) Page 1-9

$A = \%\ Rec = \frac{A^T - A^0}{A^F}$

Section 1.4: Clarify the definition of Accuracy in Section 1.4. Diff than Draft?

10) Page 1-10

Table 1-~~1~~ 2: The Hazardous Substance List parameters are known as the Target Compound List (TCL) parameters. The CLP method of analysis of volatile organics is a GC/MS method, not a GC method. The CLP precision limit is not 25%; it is 20% for relative percent difference for sample values greater than or equal to five times the contact requited detection limit (CRDL). A control limit of ±CRDL is used for sample values <5 x CRDL. change / Changed

11) Page 1-11 FIG. 1-3 "Project Responsibilities Chart"

Section 1.5: This section describes the duties of each individual without describing a managerial hierarchy. Explain who is responsible to whom so that the chain of command is clear.

12) Page 2-1

It is apparent that a typographical error was made on the date of the U.S. EPA approval letter. changed to April, 1989 (Nov 1948)

13) Page 2-3

On Table 2-1, well L-4 is listed as having a ~~20 foot~~ 10' screen interval. A 10 foot screen interval was a specific conditional approval requirement of the Groundwater Quality Assurance Plan (GWQAP). 16'→6'

14) Page 2-4 "Ship off to appropriate facility"

Modification? Store in Lagoon. "EKCO PROPOSAL TO M. EGGERT

The well/soil cuttings generated from drilling activities should be stock piled after each well completion so potentially contaminated cuttings will not contaminate the surface soils.

15) Page 2-4

It is indicated in Paragraph 4 that a 5-foot bentonite slurry seal will be tremied from the top of the sand pack. The GWQAP - Well Installation Protocol specifies a 2-foot seal of bentonite pellets gravity feed on top of the sand pack. Clarify which method was actually employed during well installation. Provide an explanation if the GWQAP procedures were not followed.

16) Page 2-8

In the discussion of water level measurements it should be included that:

1. Elevations of all wells and piezometers will be determined with respect to mean sea level, not to an arbitrary and temporary bench mark; and

2. Separate potentiometric maps shall be constructed using data from wells in the sandstone and wells in the unconsolidated sediments.

17) Page 2-~~11~~

A method for detecting dense phase immiscible layers must be included in the monitoring well sampling documentation.

18) Page 2-12

The pumping rate should not exceed 100 ml/minute when sampling for VOC's and pH. Well purging/excavation pumping rates should not exceed well development rates and must be maintained at a rate which does not cause recharge water to be excessively agitated.

19) Page 2-13

Before shutting off the pump in W-10 to measure recovery the following steps must be taken:

1. The pumping rate in W-10 must be determined and held steady for as long as practicable - certainly longer than 12 hours implied in item 7, page 2-14; and

2. Pumpage in other production wells must be held steady throughout the test period.

20) Page 2-14

Post-calibration of the SE-200 data loggers would be beneficial to ensure accuracy of data.

21) Page 2-18

"APPROPRIATE SAMPLING VESSEL" IN QAPP

The soil boring program states that when samples are required for analysis, a soil sample will be immediately transferred into wide mouth sample jar. Section 3.2, Table 3-1 of the QAPP specifies that glass, teflon-lined silicone rubber septum, 40 ml vials will be used to store soil samples when analyses are required VOC's. Clarify which container is actually going to be used. What volume of soil material is required when analyzing for VOC's?

22) Page 2-~~22~~ 23

Stream flow measurements which include velocity and cross-section measurements should be completed per United States Geological Survey methods.

23) Page 2-22

Mod.

Section 2.6, Item 3: This statement implies that preservatives will be introduced into the sample containers prior to sample collection. Preservation shall occur after sample collection. This is not only preferable but essential if a sample is to be filtered.

24) Page 3-3

Table 3-1, Aqueous Samples: Metals are listed as an analyte, but the preservation column indicates that some or all samples will be filtered, If samples are filtered, the analyte is Dissolved Metals. It is not clear from this table or other mentions of analyses to be performed whether the analyses will be for Total Metals, Dissolved Metals, both, or sometimes one and sometimes the other. This should be clarified throughout this document. Aqueous cyanide samples should be adjusted to a pH of 12.

Table 3-1, Soil Samples: Under container description for volatile organics "silicone rubber system" should be changed to "silicone rubber septum".

25) Page 3-4

Section 3.2.2: The last sentence refers to analyses other than those listed in Table 3-1. Since the analyses specified in Table 3-1 are the same ones specified previously in the test, what other analyses are being referred to?

26) Page 3-4

Section 3.2.3: See previous comment. What analytes are not listed in Table 3-1? Where are they listed or described?

27) Page 3-7

Section 3.6, Paragraph 1: Replicate analyses should be scheduled at a regular frequency (for example, every tenth or twentieth sample). Random scheduling is all right for a blind test of the analyst, but should not supplant the regular replicate analysis of 10-20% samples.

28) Page 3-9

Section 3.6: Specify that trip blanks will travel to and from the field without even being opened.

29) General Comments on Section 4: This section is unsatisfactory and must be redone. It is entirely unclear which parameters are to be analyzed by which methods. Table 1-1, Page 10, gives reference to the CLP Organic and Inorganic Statements of Work. Which analytical protocols will be followed?

30) References should be given in Table 4-1 for methods 624 and 524, SW-846 is given as a reference for metals and cyanide analyses, but specified numbers corresponding to analysis ICP, flame AA or furnace AA have not been given. This information should be provided.

31) On page 4-3, Table 4-1 indicates that soil and stream sediment samples will be analyzed for volatile organics using EPA Method 624. Method 624 is a water method and is not appropriate for solids. Method 8240 from SW-846 would be an appropriate method.

32) On page 4-2, the organic parameters for groundwater samples are described as HSL volatile organics; the analytical method is EPA method 524. This does not identify the method adequately, EPA method 524.1 differs from 524.2 and is appropriate for a different list of parameters. Neither the 524.1 list nor the 524.2 list of parameters corresponds to the HSL volatile organics. Either the parameters to be determined or the methods to be used must be changed so that they are compatible.

33) On page 4-3, method 624 is to be used to analyze HSL volatile organics. Method 624 is appropriate for Priority Pollutants which are a subset of the HSL compounds, Why not use Method 8240 from SW-846 which is specifically for HSL volatiles?

34) Section 4.1.2, Paragraph 1, last sentence: This sentence states that off-site well samples will be analyzed for volatile organics by methods 502 and 503. Table 4-1, page 4-1 states that the analytical method will be 524. Which one will be used?

35) Section 4.1.2, Paragraph 2, last sentence: EPA, CLP data validation can be performed for samples analyzed by CLP or SW-846 methods. But how can it be applied to samples from wells I-7 and

I-8 if they are analyzed by methods 502 and 503 (preceding paragraph) or method 524 (Table 4-1)?

Page 4-6

36) Paragraph 2: Specify exactly which method will be used for the analysis of each metal. Different methods within the U.S. EPA 6000/700 series have different detection limits and limitations; some may be more appropriate than others for the overall project objectives.

37) Paragraph 2 says HSL volatiles will be analyzed by EPA Method 8240; Table 4-1, Page 4-3 says method 624 will be used. 8240 is the appropriate method; Table 4-1 should be revised.

Page 4-7

38) Table 4-2: The analytical methods listed for each sample matrix do not agree with the methods listed in Table 4-1 or with the information in the text.

39) It would be helpful to include in this table or somewhere else in the document precise instructions on how many sample containers need to be filled for each sample matrix for each analysis, including QC sample requirements. Extra sample containers will have to be filled for the samples requiring matrix spike/matrix spike duplicate analyses (See Section 5.5, last bullet).

40) Page 5-1

Section 5.2, third bullet: What is a reference blank?

41) Page 5-2

Section 5.3, first sentence: Is this a Project Quality Assurance Officer or a Laboratory QA Officer?

42) Page 5-3

Section 5.4.1: It is unclear from Section 4 of this document when samples will be analyzed for volatile organics by GC methods and when by GC/MS. If indeed GC/MS method will be employed for some analyses, this section should discuss GC/MS procedures in addition to GC, ICP, and AA.

43) Page 5-3

Section 5.4.1.2, first sentence: Specify how large each laboratory lot of samples is or at what frequency the QC samples will be analyzed.

44) Page 5-4

Section 5.4.1.3: The CLP CRQL's are appropriate only for CLP method, which do not include any GC methods.

45) Page 6-2

Section 6.2.6, first paragraph: A Data Administrator was not mentioned in Section 1.5 in which project responsibilities were described. To whom is this person responsible?

46) Page 6-5

Section 6.2.6, last sentence: Reference is made to three types of deliverable packages, but only two types are described.

47) Page 7-1

Section 7.2, first sentence: It is stated that an audit may be performed. How is it decided if an audit will be performed? If one or more audits will definitely be performed, this section should state as much.

48) Page 7-2

Section 7.4.2.1: This section is labelled Gas Chromatography, but it describes activities relevant to gas chromatography/mass spectrometry.

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5SMQA

MEMORANDUM

DATE:

SUBJECT: Quality Assurance Project Plan - EKCO Housewares, Inc., Massillon, Ohio, June 1988.

FROM: Andrea Jirka, Chief
Monitoring and Quality Assurance Branch

TO: Walter Nied,
RCRA Enforcement, OH/MN Unit

The Quality Assurance Section has reviewed the subject document and finds that it does not accurately describe what needs to be done for the specified project. The QAPP references CLP procedures, NPDES methods, SDWA methods and RCRA methods. Table 4-1, page 4-3, identifies method 624 (an NPDES method for water) for soil samples. RCRA method 5030 would be more appropriate for soils. CLP specified quanititation and detection limits may not be appropriate for this project. Is there to be clean-up involved and to what contaminant level must the site and ground be cleaned up? Since this is a RCRA site, the QAPP should be revised to conform to RCRA methods where possible and to NPDES or SDWA methods if appropriate. At this time, CLP procedures have no bearing on the subject protocol.

If there are questions, please call Maxine Long at 353-3114.

M&E®

Metcalf & Eddy

6480 BUSCH BOULEVARD
SUITE 200
COLUMBUS, OHIO 43229
TELEPHONE (614) 436-5550

July 26, 1988

Mr. Walter Neid
RCRA Enforcement Section
230 S. Dearborn Street
Chicago, IL 60604

Subject: Review Comments on
Draft Quality Assurance Project Plan
Ekco Housewares
Assignment 483

Dear Wally:

As per our conversation, attached are our review comments on the Draft QAPP for Ekco Housewares, RFI/CMS.

Sincerely,

Gerald R. Myers (MS)
Gerald Myers
Associate

JJS/ny

cc: D. Geers
G. Stotler
T. Struttmann
File

ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL ENFORCEMENT SUPPORT
AT HAZARDOUS WASTE SITES

TES IV
CONTRACT NO. 68-01-7351
WORK ASSIGNMENT NO. 483

REVIEW COMMENTS ON DRAFT QAPP
EKCO HOUSEWARES, INC.

EPA REGION V

JACOBS ENGINEERING GROUP, INC.
PROJECT NO. 05-B483-00

WORK ASSIGNMENT PERFORMED BY:

METCALF & EDDY, INC.
6480 BUSCH BOULEVARD, SUITE 120
COLUMBUS, OHIO 43229

July 28, 1988

TABLE OF CONTENTS

1.0 INTRODUCTION

U.S. EPA has entered into a Consent Agreement with Ekco Housewares, Inc. under Section 3008(h) of RCRA in 1987. This action requires Ekco to conduct a RCRA Facility Investigation, Corrective Measures Study, and Corrective Measures Implementation (RFI/CMS/CMI) at their Massillon, Ohio facility. A corrective action alternative will be selected by U.S. EPA and implemented by Ekco at the completion of the RFI/CMS.

U.S. EPA has requested that the TES Contractor represent U.S. EPA and provide assistance in monitoring and inspecting any RFI/CMS/CMI work performed on-site, provide professional technical support personnel to review the Corrective Action Plan, draft and final RFI, CMS, CMI reports, and conduct an independent, preliminary hydrologeologic assessment of the Massillon, Ohio area.

This document presents the TES contractor's review comments on the June, 1988 Draft Quality Assurance Project Plan presented by Ekco Houseware's contractor, Weston, Inc.

2.0 GENERAL DESCRIPTION

The Ekco Housewares, Ohio Plant, Massillon Division, is located at 359 State Avenue Extension N.W., Massillon, Ohio in the eastern part of Massillon, Ohio. The area of concern is located due north of the juncture of the Penn Central and Baltimore and Ohio Railroads, south of Kelso Creek, and west of the Tuscarawas River.

The reasons for concern in this area are that hazardous chlorinated organic compounds have been detected in groundwater which provides the Massillon municipal water supply. The Massillon municipal wells are owned and operated, under contract, by the Ohio Water Service Co. One well has already been abandoned because of contamination by the organic solvents and their degradation products. It is essential to prevent this contamination from reaching other city wells or private wells in the area.

The suspected source of contamination is the area of concern; industrial and residential area about two-thirds of a mile west of the Tuscarawas River in which Ekco Housewares, Inc., is located. Ekco is known to have used the contaminants found in the groundwater, and is suspected of having released them to the environment.

The Ekco Housewares has been in operation since at least 1945, and operated an industrial waste water treatment lagoon until 1985. The lagoon was operated under RCRA interim status since 1980. The plant also has an Ohio NPDES permit to discharge industrial waste water to Newman Creek and the Tuscawarwas River.

The plant discharged approximately 200,000 gpd of contaminated industrial process wastewater to the lagoon. Because there is no record of a surface discharge from the lagoon, it is surmised that contaminated waste water from the lagoon has been discharged into the groundwater below the facility.

3.0 SPECIFIC COMMENTS EKCO HOUSEWARES ON QAPP; JUNE 1988

Page 1-1

The larger document should be called something other than a Quality Assurance Project Plan since it encompasses more than a QAPP (see sentence 1 of paragraph 2). A QAPP within a QAPP is confusing document labelling.

Page 1-3

Paragraph 1, last sentence: List the specific waste materials that were produced (and discharged) in the manufacture of porcelain/teflon-coated aluminum cookware. This information is needed to determine whether or not the appropriate analyses have been planned.

Page 1-3

Paragraphs 2 & 3: Include a table listing contaminants detected at the Ekco facility.

Page 1-3

Last Paragraph: Weston persists in saying that the valley fill is "greater than 250 feet thick". Drift thickness maps at Ohio Division of Geologic Survey show a little over 200 ft, maximum, a fact previously called to their attention.

Page 1-7

"Aquifer Testing". It should be stated that aquifer properties will be determined only for the sandstone aquifer. The test will also be useful in determining whether a close hydraulic connection exists between the sandstone aquifer and the overlying unconsolidated sediments.

Page 1-7

Section 1.3.3, last sentence: The list of analytes is not well enough defined. Which VOC's? Priority pollutants? Target compound list? Appendix IX 40 CFR Part 264? Which heavy metals? Perhaps the current analyses used in monthly monitoring shall be referenced.

Page 1-7

Section 1.3.5, third sentence: If fuel oil and gasoline contamination of soils may have occurred, analysis of samples for at least those semi-volatile organic compounds found in fuels should be considered.

Page 1-9

Section 1.4, Accuracy definition: The statement that "Accuracy is assessed by means of...percent recoveries" needs some clarification. Error may also arise from matrix effects on the analyte recovery. This is determined from analysis of matrix spiked samples. The recovery of the spiked analyte is described as a percentage of the analyte spiked into the sample matrix.

Page 1-10

Table 1-1: The Hazardous Substance List parameters are now known as the Target Compound List (TCL) parameters. The CLP method for analysis of volatile organics is a GC/MS method, not a GC

method. The CLP precision limit is not 25%; it is 20% for relative percent difference for sample values greater than or equal to five times the contract required detection limit (CRDL). A control limit of ±CRDL is used for sample values <5 x CRDL.

Page 1-11

Section 1.5: This section describes the duties of each individual without describing a managerial hierarchy. Explain who is responsible to whom so that the chain of command is clear.

Page 2-8

In the discussion of water level measurements it should be included that:

1. Elevations of all wells and piezometers will be determined with respect to mean sea level, not to an arbitrary and temporary bench mark.

2. Potentiometric maps should be constructed separately of wells in the sandstone and wells in the unconsolidated sediments. The TES contractor believes the potentiometric contours in the shallow sediments will replicate the contours in the sandstone, contrary to the way they were depicted in previous reports on the Ekco site.

Page 2-12 to 2-15

A detailed description of the aquifer test methods was to be submitted as a Technical Memorandum to the sampling plan. If that is the case, the brief description of the test methods described in the QAPP provides a satisfactory overview of the test methods. However, if the description in the QAPP is the complete aquifer testing process, M&E has the following comments.

Before shutting off the pump in W-10 to measure recovery the following steps must be taken if the test is to have value:

1. The pumping rate in W-10 must be determined and held steady for as long as practicable - certainly longer than the 12 hours implied in item 7, p. 2-14.

2. Pumpage in other production wells must be held steady throughout the test period.

3. Suggest a review of article by C.E. Jacob in Water Supply Paper 1536-I, entitled, "the recovery method for determining the coefficient of transmissibility".

Page 2-22

Section 2.6, Item 3: This statement implies that preservatives will be introduced into the sample containers prior to sample collection. Preservation should occur after sample collection. This is not only preferable but essential if a sample is to be filtered. According to a statement on Page 2-4, Item 6, samples will be collected for dissolved metals analyses, in which case addition of preservative to the container must follow sample collection and filtering.

Page 3-3

Table 3-1, Aqueous Samples: Metals are listed as an analyte, but the preservation column indicates that some or all samples will be filtered. If samples are filtered, the analyte is Dissolved Metals. It is not clear from this table or other mentions of analyses to be performed whether the analyses will be for Total Metals, Dissolved Metals, both, or sometimes one and sometimes the other. This should be clarified throughout this document. pH adjustment for aqueous cyanide samples should be to a pH $\geq$ 12.

Table 3-1, Soil Samples: Under container description for volatile organics, "silicone rubber system" should be changed to "silicone rubber septum".

Page 3-4

Section 3.2.2: The last sentence refers to analyses other than those listed in Table 3-1. Since the analyses specified in Table 3-1 are the same ones specified previously in the text, what other analyses are being referred to?

Section 3.2.3: See previous comment. What analytes are not listed in Table 3-1? Where are they listed or described? This is a serious omission.

Page 3-7

Section 3.6, Paragraph 1: Replicate analyses should be scheduled at a regular frequency (for example, every tenth or twentieth sample). Random scheduling is all right as a blind test of the analyst, but should not supplant the regular replicate analysis of 10-20% of samples.

Page 3-9

Section 3.6: Specify that trip blanks will travel to and from the field without ever being opened.

General Comment on Section 4: This section is unsatisfactory and must be redone. It is entirely unclear which parameters are to be analyzed by which methods. The following comments point out the numerous inconsistencies in this section.

Pages 4-2

Table 4-1: This table lists analytical methods

to 4-3

from the following three references:

1) Test Methods for Evaluating Solid Waste, U.S. EPA SW-846, Third edition, November 1986;

2) Methods for the Determination of Organic Compounds in Finished Drinking Water and Raw Source Water, U.S. EPA, September 1986;

3) Federal Register, October 26, 1984, 40 CFR Part 136.

However, Table 1-1, Page 1-10, gives references to the CLP Organic and Inorganic Statements of Work. Which analytical protocols will be followed?

References should be given in Table 4-1 for methods 624 and 524. SW-846 is given as a reference for metals and cyanide analyses, but specific method numbers corresponding to analysis by ICP, flame AA or furnace AA have not been given. This information should be given.

On Page 4-3, Table 4-1 indicates that soil and stream sediment samples will be analyzed for volatile organics by EPA Method 624. 624 is a water method and is not appropriate for solids. Method 8240 from SW-846 would be an appropriate method.

On Page 4-2, the organic parameters for groundwater samples are described as HSL volatile organics; the analytical method is EPA method 524. This does not identify the method adequately: EPA method 524.1 differs from 524.2 and is appropriate for a different list of parameters. Neither the 524.1 list or the 524.2 list of parameters corresponds to the HSL volatile organics. Either the parameters to be determined or the methods to be used must be changed so that they are compatible.

On Page 4-3, method 624 is to be used to analyze HSL volatile organics. Method 624 is appropriate for Priority Pollutants which are a subset of the HSL compounds. Why not cite Method 8240 from SW-846 which is specifically for HSL volatiles?

Page 4-4

Section 4.1.2, Paragraph 1, last sentence: This sentence states that off-site well samples will be analyzed for volatile organics by methods 502 and 503. Table 4-1, page 4-2 states that the analytical method will be 524. Which one will be used?

Section 4.1.2, Paragraph 2, last sentence: EPA CLP data validation can be performed for samples analyzed by CLP or SW-846 methods. But how can it be applied to samples from wells I-7 and I-8 if they are analyzed by methods 502 and 503 (preceding paragraph) or method 524 (Table 4-1)?

Page 4-6

Paragraph 2: Specify exactly which method will be used for the analysis of each metal. Different methods within the EPA 6000/7000 series have different detection limits and limitations; some may be more appropriate than others for the overall project objectives.

This paragraph says HSL volatile organics will be analyzed by EPA Method 8240; Table 4-1, Page 4-3 says method 624 will be used. 8240 is the appropriate method; Table 4-1 should be corrected.

Page 4-7

Table 4-2: The analytical methods listed for each sample matrix do not agree with the methods listed in Table 4-1 or with the information in the text.

It would be helpful to include in this table or somewhere else in the document precise instructions on how many sample containers need to be filled for each sample matrix for each analysis, including QC sample requirements. Extra sample containers will have to be filled for the samples requiring matrix spike/matrix spike duplicate analyses (See Section 5.5, last bullet).

Page 5-1

Section 5.2, third bullet: What is a reference blank?

Page 5-2

Section 5.3, first sentence: Is this a Project Quality Assurance Officer or a Laboratory QA Officer?

Page 5-3

Section 5.4.1: It is unclear from section 4 of this document when samples will be analyzed for volatile organics by GC methods and when by GC/MS. If indeed GC/MS methods will be employed for some analyses, this section should discuss GC/MS procedures in addition to GC, ICP and AA.

Page 5-3

Section 5.4.1.2, first sentence: Specify how large each laboratory lot of samples is or at what frequency the QC samples will be analyzed.

Page 5-4

Section 5.4.1.3: The CLP CRQLs are appropriate only for CLP methods, which do not include any GC methods.

Page 6-2

Section 6.2.6, first paragraph: A Data Administrator was not mentioned in Section 1.5 in which project responsibilities were described. To whom is this person responsible?

Page 6-5

Section 6.2.6, last sentence: Reference is made to three types of deliverable packages, but only two types are described.

Page 7-1

Section 7.2, first sentence: It is stated that an audit may be performed. How is it decided if an audit will be performed. If one or more audits will definitely be performed, this section should state as much.

Page 7-2

Section 7.4.2.1: This section is labelled Gas Chromatography, but it describes activities relevant to gas chromatography/mass specrometry. The section heading should be consistent with the section contents.

OhioEPA
State of Ohio Environmental Protection Agency
P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Richard F. Celeste
Governor

July 25, 1988

Mr. Walter Nied
Ohio-Minnesota Technical Enforcement Section
Hazardous Waste Enforcement Branch 5HS-12
U.S. EPA - Region V
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Nied:

The following comments regarding the DRAFT QUALITY ASSURANCE PROJECT PLAN (QAPP) submitted by Ekco Housewares, Inc. will have to be addressed prior to concurrence and approval of the QAPP.

PAGE NUMBER	COMMENT
1-3	While a general background description of the facility is helpful, the section on geology and hydrogeology appears to be out of place as these sections are addressed in the GROUND WATER QUALITY ASSESSMENT PLAN (GWQAP), previously approved by U.S.EPA. Specifically, the QAPP states that the glacial outwash deposits are predominately clay. This is contradictory to the GWQAP which states, "the site directly overlies glacial outwash deposits of interbedded and interlensing sand, gravel and clay."
1-7	The ground water sampling program should include all on-site and off-site wells.
2-1	It is apparent that a typographical error was made on the date of the USEPA approval letter. The date should be April 29, 1988 not April 29, 1944.
2-3	On Table 2-1, well L-4 is listed as having a 20 foot screen interval. A 10 foot screen interval was a specific conditional approval requirement of the GWQAP.
2-4	The well/soil cuttings generated from drilling activities should be stock piled after each well completion so potentially contaminated cuttings will not contamination the surface soils.

PAGE NUMBER	COMMENT
2-4	It is indicated in Paragraph 4 that a 5-foot bentonite slurry seal will be tremied from the top of the sand pack. The GWQAP - Well Installation Protocol specifies a 2-foot seal of bentonite pellets gravity feed on top of the sand pack. Which method(s) were actually employed during well installation?
2-11	A method for detecting dense phase immiscible layers should be included in the monitoring well sampling documentation. The primary constituents of concern at the Ekco Housewares facility are trichloroethylene (TCE) and trichloroethane (TCA) which both have densities greater than water and have tendencies to sink. This procedure should be completed prior to well excavation.
2-12	The pumping rate should not exceed 100 ml/minute when sampling for volatile organic compounds (VOC's) and pH. Well purging/excavation pumping rates should not exceed well development rates and must be maintained at a rate which does not cause recharge water to be excessively agitated.
2-14	Post-calibration of the SE-200 data loggers would be beneficial to ensure accuracy of data.
2-18	The soil boring program states that when samples are required for analysis, a soil sample will be immediately transferred into wide mouth sample jar. Section 3.2, Table 3-1 of the QAPP specifies that glass, teflon lined silicone rubber system, 40 ml vials will be used to store soil samples when analyses are required VOC's. Which container is actually going to be used? What volume of soil material is required when analyzing for VOC's.
2-22	Stream flow measurements which include velocity and cross-section measurements should be completed per United States Geological Survey methods.

Should you have any questions, please feel free to contact me at (614) 644-2905.

Sincerely,

Michael L. Eggert

Michael L. Eggert, Hydrogeologist
Solid and Hazardous Waste Section
Division of Ground Water

MLE/

cc: Gary Martin, OEPA, DGW-CO
Tim Krichbaum, OEPA, DGW-CO
Dave Sholtis, OEPA, DSHWM-CO
Dave Wertz, OEPA, DSHWM-NEDO
Susan McCauslin, OEPA, DSHWM-NEDO
Chris Khourey, OEPA, DGW-NEDO

AMERICAN HOME PRODUCTS CORPORATION

685 THIRD AVENUE
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(212) 878-5000

June 24, 1988

Mr. Walter Nied
US Environmental Protection Agency
Region V, 5HE-12
230 South Dearborn, St.
Chicago, Il 60604

Dear Mr. Nied:

Attached for your review and approval are two (2) copies of the Quality Assurance Project Plan for the Ekco Housewares Inc. site in Massillon, Ohio. The QAPP is being submitted in furtherance of the Groundwater Quality Assessment Program currently being implemented at the Ekco site. A copy of this QAPP is being submitted under separate cover to the Ohio EPA.

Included in the QAPP submission is a copy of the revised project schedule previously discussed and agreed upon. As per the attached schedule, the installation of the groundwater monitoring wells for the site is continuing, with additional well installation beginning during the week of June 27, 1988. Upon completion of this series of wells, all of the groundwater monitoring wells described in the GQAP should be installed.

Should you have any questions on this matter, please feel free to contact me at (212) 878-5769.

Very truly yours

Timothy McGuinness

Timothy McGuinness
Manager, Environmental Engineering

cc: w/o enclosure
S. Tasher
G. Jibilian

enclosure under separate cover
T. Shingleton
S. McCauslin, OEPA

EKCO HOUSEWARES GROUNDWATER ASSESSMENT PLAN SCHEDULE

Description	1988				
	MAY	JUNE	JULY	AUGUST	SEPTEMBER
APPROVAL OF GWQAP	APPROVAL OF GWQAP				
PREPARATION OF PLANS	PREPARATION OF PLANS				
REVIEW OF SAMPLING PLAN	REVIEW OF SAMPLING PLAN				
APPROVAL OF SAMPLING PLAN	APPROVAL OF SAMPLING PLAN				
REVIEW OF HEALTH AND SAFETY PLAN	REVIEW OF HEALTH AND SAFETY PLAN				
APPROVAL OF H & S PLAN	APPROVAL OF H & S PLAN				
REVIEW OF QA\QC PLAN	REVIEW OF QA\QC PLAN				
APPROVAL OF QA\QC PLAN	APPROVAL OF QA\QC PLAN				
GROUND WATER INVESTIGATIONS	GROUND WATER INVESTIGATIONS				
WELL INSTALLATION	WELL INSTALLATION				
GW SAMPLING	5/16, 18	GW SAMPLING			
AQUIFER TESTING		AQUIFER TESTING			
GW ANALYSIS			GW ANALYSIS		
SOIL INVESTIGATIONS		SOIL INVESTIGATIONS			
SOIL GAS SAMPLING	SOIL GAS SAMPLING				
SOIL BORINGS	SOIL BORINGS				
SEDIMENT SAMPLING	SEDIMENT SAMPLING				
SOIL ANALYSIS		SOIL ANALYSIS			
SURFACE WATER INVESTIGATIONS	SURFACE WATER INVESTIGATIONS				
STREAM SAMPLING	STREAM SAMPLING				
SW ANALYSIS		SW ANALYSIS			
PRESENTATION OF RESULTS (TM)					PRESENTATION OF RESULTS (TM)
ANALYSIS OF DATA					ANALYSIS OF DATA
SUPPLEMENTAL INVESTIGATIONS					SUPPLEMENTAL INVESTIGATIONS
FINAL REPORT					FINAL REPORT